

AO 91 (Rev. 11/11) Criminal Complaint

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UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America  
v.  
Nathanal Michael PACE

Case:2:19-mj-30637  
Judge: Unassigned,  
Filed: 12-05-2019 At 12:41 PM  
USA v. NATHANAL MICHAEL PACE (CMP)(  
MLW)

**CRIMINAL COMPLAINT**


I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 1, 2019 - December 5, 2019 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

| <i>Code Section</i>     | <i>Offense Description</i>              |
|-------------------------|---|
| 18 USC § 2251(a)        | Production of child pornography         |
| 18 USC § 2252A(a)(2)    | Distribution of child pornography       |
| 18 USC § 2252A(a)(5)(B) | Receipt/possession of child pornography |

This criminal complaint is based on these facts:  
see attached affidavit.


☒ Continued on the attached sheet.

  
Complainant's signature  
Jay V. Ratermann, Special Agent (HSI)  
Printed name and title

Sworn to before me and signed in my presence.

Date: December 5, 2019

City and state: Detroit, Michigan

  
Judge's signature  
Hon. Anthony P. Patti, United States Magistrate Judge  
Printed name and title

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR COMPLAINT AND  
ARREST WARRANT**

**I. INTRODUCTION**

I, Jay Ratermann, having been first duly sworn, do hereby depose and state as follows:

1. I have been employed as a Special Agent of Homeland Security Investigations (HSI) and its predecessor agency the U.S. Customs Service Office of Investigations since 2001, and am currently assigned to the Internet Crimes Against Children Task Force (ICAC) in Livonia, Michigan. While employed by HSI, I have investigated federal criminal violations related to child exploitation, and child pornography. I have gained experience through training and everyday work relating to conducting these types of investigations. I have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media. Moreover, I am a federal law enforcement officer who is engaged in enforcing the criminal laws, including 2252A.

2. This affidavit is made in support of an application for a criminal complaint and arrest warrant for **Nathanal Pace** (date of birth 06/XX/1995) for violations of: 18 U.S.C. §§ 2251(a), 2252A(a)(2), 2252A(a)(5)(B) (production, distribution, receipt, and possession of child pornography).

3. The statements contained in this affidavit are based in part on: written

reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents; independent investigation and analysis by law enforcement officers/analysts and computer forensic professionals; and my experience, training and background as a Special Agent (SA) with HSI. Because this affidavit is being submitted for the limited purpose of securing authorization for the requested arrest warrant, I have not included each and every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish probable cause that **Pace** has violated Title 18 U.S.C. §§ 2251(a), 2252A(a)(2), 2252A(a)(5)(B) (production, distribution, receipt, and possession of child pornography).

#### **Background of Investigation**

4. In November of 2019, the Michigan State Police (MSP), as a part of the Internet Crimes Against Children (ICAC) received tips from the National Center for Exploited and Missing Children (NCMEC) that a user had uploaded approximately 36 videos and images that were suspected child pornography on September 8, 2019 to a Dropbox account with the username Nathanal Pace and associated email address nathenpace@gmail.com. The user had uploaded the images from a specific IP address that came back to a residence XXXXX Bringard Street, Detroit, Michigan. Open source searches showed a Nathanal Pace resided at the Bringard Street address.

Google provided information that the subscriber for the email account nathenpace@gmail.com was Nathanal Pace with a backup email of npace@detroitdenby.org. Your affiant reviewed one of the suspected child pornography videos that had been uploaded on September 8, 2019. That video depicted an approximately six year-old African American boy [hereinafter MV-1] performing oral sex on an adult black male. The video meets the federal definition of child pornography.

5. On December 5, 2019, the ICAC task force (including MSP and HSI) executed a state of Michigan search warrant at the Bringard Street address. Pace was present at the scene of the search warrant. He agreed to speak to law enforcement after receiving *Miranda* warnings and made the following statements:

- He admitted to receiving child pornography images via two social media applications on his cellular phone;
- He said that law enforcement would find approximately 6,000 child pornography images and/or videos on his phone;
- He stated that he believed a child was defined as any person under the age of 13;
- He admitted to producing 10 videos and 10 images of MV-1 and stated that one of the videos he recorded depicts MV-1 performing oral sex on him;
- He acknowledged that he had shared production images and videos with others

on the Internet at least six times and admitted that he had shared his Dropbox with other Internet users;

- He admitted that his email address was nathenpace@gmail.com. He also admitted to using npace@detroitdenby.org;
- He said he was in an online group where others would share child pornography with him and he would share child pornography with them;
- He admitted that on one occasion, he abused the sister of MV-1, an approximate four-year old African American girl [hereinafter MV-2]. Specifically, he produced child pornography of MV-2 by recording her licking his penis;
- Pace said that he recorded the video of MV-1 performing oral sex on him in January or February of 2019 and that he recorded the video of MV-2 licking his penis at some point in 2019.

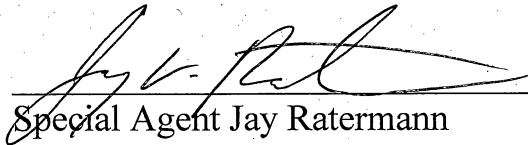
6. Pace's cellular phone was recovered and is in the process of being forensically previewed. The video of MV-2 (described above) is on the cellular phone in the device's photo gallery. Your affiant has reviewed this video and it meets the federal definition of child pornography. The phone appears to have hundreds of videos and images that meet the federal definition of child pornography.

7. MV-1 and MV-2 have been identified and have not yet been interviewed. They are the children of Pace's friend's sister and live in Detroit, Michigan.


**CONCLUSION**

8. Based on the foregoing, there is probable cause to believe **Nathanal Pace** (06/XX/1995) has produced, distributed, received, and possessed child pornography, in violation of 18 U.S.C. §§ 2251(a), 2252A(a)(2), 2252A(a)(5)(B).

Respectfully submitted,

  
Special Agent Jay Ratermann  
Homeland Security Investigations

Sworn to and subscribed before me this 5<sup>th</sup> day of December, 2019.

  
Hon. Anthony P. Patti  
United States Magistrate Judge